William Cafaro, Esq. Partner ADMITTED IN NY, CA, MD & TX Email: <u>bcafaro@cafaroesq.com</u>

Amit Kumar, Esq. Managing Attorney ADMITTED IN NY & NJ Email: akumar@cafaroesq.com

Andrew S. Buzin, Esq. Of Counsel ADMITTED IN NY, FL & DC



108 West 39th Street, Suite 602 New York, New York 10018 Telephone: 212.583.7400 Facsimile: 212.583.7401 <u>าเกเกเ.cafaroesq.com</u>

Louis M. Leon, Esq. Associate ADMITTED IN NY Email: <u>Ileon@cafaroesq.com</u>

Matthew S. Blum, Esq. Of Counsel ADMITTED IN NY Email: mblum@cafaroesq.com

April 14, 2023

Via ECF

John G. Koeltl, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> Re: Rodriguez v. 224-236 Realty LLC, et al Case No. 23-cv-420 (JGK)

Your Honor:

This firm represents Plaintiff in the above-referenced action. We effectuated service of the summons and complaint on the corporate Defendant, 224-236 Realty LLC. However, despite numerous attempts, we have been unable to effectuate service on the individual Defendants, Eric Samson and Domingo Del Rosario. It is our belief that these individuals are deliberately evading service. As such, we ask that the Court extend the deadline to serve the summons and complaint on these individual Defendants from April 17, 2023 to July 17, 2023. This is our first time requesting an extension of this deadline. We thank the Court for its attention and consideration to this submission.

Respectfully submitted,

APPLICATION GRANTED

John G. Koelll, U.S.D.J.

Louis M. Leon, Esq. (LL 2057) Attorneys for Plaintiff

¹ 224-236 Realty LLC has failed to file an answer or otherwise appear in this case.